

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Courts
Southern District of Texas
FILED

MAY 15 2019

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

V.

ALDO ROGOBERTO GUERRA-GUEVARA
AKA Primo, AKA Servando,

CRIMINAL NO. 19- 363

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Conspiracy to Possess With Intent to Distribute Controlled Substance)

From in or about October 2018, and continuing through at least February 2019, in the Southern District of Texas and elsewhere **Defendants,**

ALDO ROGOBERTO GUERRA-GUEVARA, aka Primo, aka Servando,

did knowingly and intentionally conspire and agree with each other and with other persons known and unknown to the Grand Jurors to possess with intent to distribute a controlled substance. This

offense involved a quantity of at least 5 kilograms of a mixture containing cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A).

COUNT TWO

(Conspiracy to Launder Monetary Instruments)

From in or about October 2018, and continuing through at least February 2019, in the Southern District of Texas and elsewhere **Defendants,**

ALDO ROGOBERTO GUERRA-GUEVARA, aka Primo, aka Servando,



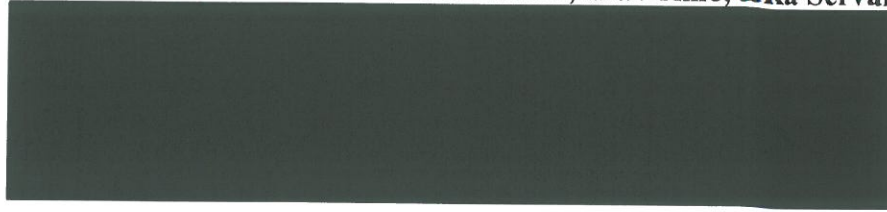
did knowingly and intentionally combine, conspire, confederate, and agree with each other and with other persons known and unknown to the Grand Jurors to transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds involving the proceeds of specified unlawful activity, to wit: the manufacturing, importation, sale and distribution of a controlled substance and possession with intent to distribute a controlled substance as detailed in this Indictment and in violation of the Controlled Substances Act, knowing that such transportation, transmission, and transfer was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity.

In violation of Title 18, United States Code, Sections 1956(a)(1)(B) and (h).

NOTICE OF CRIMINAL FORFEITURE
[Title 21, United States Code, Section 853]

Pursuant to Title 21, United States Code, Section 853, the United States gives notice to the defendants

ALDO ROGOBERTO GUERRA-GUEVARA, aka Primo, aka Servando,



that upon conviction of the conspiracy as charged in Count One in this Indictment, the following is subject to forfeit:

- (1) all property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense; and
- (2) all property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offense.

Money Judgment

Defendants are notified that upon conviction, a money judgment may be imposed equal to the total value of the property subject to forfeiture for which the defendant may be jointly and severally liable. The amount of the money judgment for Count One is estimated to be, but is not limited to, at least \$12,000,000 for which the defendants may be jointly and severally liable.

Substitute Assets

Defendants are notified that in the event that property subject to forfeiture, as a result of any act or omission of a defendant:

- a. cannot be located upon exercise of due diligence;
- b. has been placed beyond the jurisdiction of the Court;
- c. has been transferred or sold to, or deposited with, a third party;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

the United States will seek to forfeit any other property of the defendants up to the value of such property pursuant to Title 21, United States Code, Section 853(p).

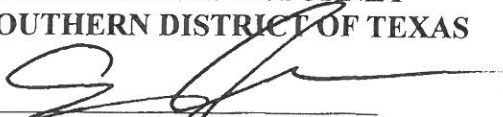
A TRUE BILL

Original Signature on File

FOREPERSON OF THE GRAND JURY

**RYAN K. PATRICK
UNITED STATES ATTORNEY
SOUTHERN DISTRICT OF TEXAS**

By:


EDWARD F. GALLAGHER
Assistant United States Attorneys
Southern District of Texas